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6 **UNITED STATES DISTRICT COURT**

7 **DISTRICT OF NEVADA**

9 UNITED STATES OF AMERICA, )  
10 )  
11 Plaintiff, ) Case No.: 2:22-mj-00864-NJK  
12 vs. )  
13 LOUIS RODRIGUEZ ) **STIPULATION TO CONTINUE  
14 PRELIMINARY EXAMINATION DATE**  
15 Defendants. ) **(THIRD REQUEST)**  
16 \_\_\_\_\_)

16 IT IS HEREBY STIPULATED AND AGREED, by and between Jason M. Frierson,  
17 United States Attorney, District of Nevada, and Edward G. Veronda Assistant United States  
18 Attorney, counsel for the United States of America, and Gabriel L. Grasso, Esq, counsel  
19 for Louis Daniel Rodriguez, that the Preliminary Examination hearing currently scheduled  
20 for January 3<sup>rd</sup> 2024 at 4:00 p.m., be vacated and set to a date and time convenient to this  
21 court but no sooner than sixty (60) days.

22 The Stipulation is entered into for the following reasons:

- 23 1. The parties require additional time to continue negotiations for a Pre-Indictment  
24 plea. The parties anticipate this request will be the final pre-indictment request  
25 for a continuance in this case.

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2. Counsel for Rodriguez has just recently been appointed under the Criminal Justice Act and will require an additional 60 days to finalize pre-indictment matters.
  3. Mr. Rodriguez is out of custody and agrees to the continuance.
  4. The parties agree to the continuance.
  5. The additional time requested herein is not sought for purposes of delay, but merely to allow counsel for defendant sufficient time within which to be able to effectively and complete investigation of the discovery materials provided.
  6. Denial of this request for continuance would result in a miscarriage of justice.
  7. The additional time requested by this Stipulation is excludable in computing the time within which the trial herein must commence pursuant to the Speedy Trial Act, Title 18, United States Code, Section 3161(h)(7)(A), considering the factors under Title 18, United States Code, Section 3161(h)(7)(B)(i), (iv).

This is the Third request for a continuance of the preliminary hearing date in this case.

DATED this 14<sup>th</sup> day of December 2023.

## GABRIEL L. GRASSO, P.C.

JASON M. FRIERSON  
United States Attorney

By /s/ Gabriel L. Grasso  
GABRIEL L. GRASSO, ESQ.  
Counsel for Louis Daniel Rodriguez

By /s/ Edward G. Veronda  
EDWARD G. VERDONA  
Assistant United States Attorney

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**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,  
Plaintiff,  
vs.  
LOUIS RODRIGUEZ,  
Defendants.

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Case No.: 2:20-mj-00864-NJK

## ORDER

Based on the Stipulation of counsel, and good cause appearing  
IT IS THEREFORE ORDERED that the Preliminary Examination hearing currently  
scheduled for January 3, 2024, at 4:00 p.m., be vacated and continued to  
March 4, 2024.

DATED this 14th day of December , 2023.

UNITED STATES MAGISTRATE JUDGE